

11/15/2020

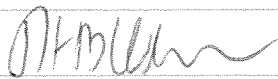
Dear Clerk of Court,

Please consider this my motion for Appointment of Counsel. I am seeking counsel to assist me with the preparation of filing a brief on my behalf to support compassionate release under the First Step Act.

I have already requested relief through the facilities Warden or designee.

The petitioner prays the court will grant this motion for Appointment of Counsel.

Sincerely,



Robert B Oldham Jr

#68882-066

F.C.I - Fort Dix

P.O. Box 2000

Joint Base MDL, NJ 08640

11/15/2020

Dear Clerk of Court,

Please consider this my motion for compassionate release. I have previously written to my Facilities Warden requesting compassionate release under the First Step Act.

I have several health conditions which the Center for Disease Control (CDC) in Atlanta, GA has identified as being an increased chance of death, if one were to become infected with COVID-19. These health conditions are:

- 1.) IGA Deficiency (weak/vulnerable immune system)
- 2.) Vulnerable/Sensitive respiratory system
- 3.) Asthma

I have no confidence in the BOP's medical services should I contract the virus. I've stated such conditions during the intake process both at Philadelphia and Fort Dix. Such given information at those times were ignored and undocumented by staff. Due to the irrelevance, any medical documentation can either be obtained through my former immunologist or health services at Fort Dix can have me tested. I apologize for their ignorance but this information really was unimportant up until COVID-19 came into existence.

Currently there are over 200 inmate cases and 15 staff member cases at Fort Dix as of November 13th. The week prior stated Fort Dix being the #1 most cases in the BOP. Infected inmates were previously transferred to this facility even when no cases existed. Social distancing is not possible. Staff members continue to socialize within close distance and without face masks. As mentioned in the media, daily cases are growing both in Pennsylvania and New Jersey. Occasionally inmates who were in "quarantine units" are being allowed into non-quarantine units that have been infection free all year. Health services claim they tested with negative results but such staff have competence to document simple immune problems into their health records. Early compassionate release has extremely low risk compared to serving my last few remaining months while outbreaks grow and medical staff continue to make risky decisions.

The following is my early release plan:

- 1.) reside at home residence and quarantining myself by socially distancing away from parents.
- 2.) reinstating driver's license with 1-2 vehicles available
- 3.) enrolling medical care that I qualify for through available providers until medical benefits become active through employer.
- 4.) temporary employment in landscaping/snow plow contracts provided with my brother-in-law. I'll be proactively applying for more permanent employment as the current economy heals itself from the pandemic.

The petitioner prays the court will grant this
motion for compassionate release.

Sincerely,

MBJ

Robert M Oldham Jr

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Robert Oldham

#68892-066

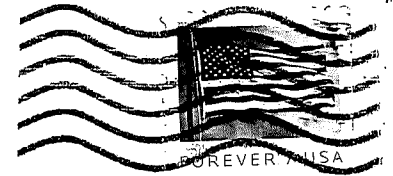
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